



CFW Telephone

ORIGINAL  
FILE

RECEIVED

NOV - 9 1992

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

400 Spring Lane

Suite 300

P. O. Box 1990

Waynesboro, Virginia 22980

Telephone 703 946-3500

FAX 703 946-3599

DDD 703 946-

November 9, 1992

NOV 09 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, NW  
Washington, DC 20554

RE: In the Matter of  
Amendment of the Commission's  
Rules to Establish New Personal  
Communications Services  
GEN Docket No. 90-314  
ET Docket No. 92-100

Dear Ms. Searcy:

Please find enclosed for filing the original and eleven copies of comments of Small Rural Virginia Telcos in the above captioned proceeding.

Thank you for your assistance in this matter.

Sincerely,

*J. S. Quarforth* WCC

J. S. Quarforth  
President

Clifton Forge-Waynesboro  
Telephone Company for  
Small Rural Virginia Telcos

1pt

Enclosures

No. of Copies rec'd 0 + 11  
List A B C D E

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

NOV 09 1992

In the Matter of	)	GEN Docket No. 90-314
	)	ET Docket No. 92-100
Amendment of the Commission's	)	
Rules to Establish New Personal	)	RM-7140, RM-7175, RM-7617,
Communications Services	)	RM-7618, RM-7760, RM-7782,
	)	RM-7860, RM-7977, RM-7978,
	)	RM-7979, RM-7980
	)	
	)	PP-35 through PP-40, PP-79
	)	through PP-85

COMMENTS OF SMALL RURAL VIRGINIA TELCOS

NOV - 9 1992

Small Rural Virginia Telcos ("SRVT") submit these comments to the FEDERAL COMMUNICATIONS COMMISSION, OFFICE OF THE SECRETARY captioned matter. Virginia telephone companies participating in these comments, and approximate number of access lines represented, include Clifton Forge-Waynesboro Telephone Company (30,000 lines), Buggs Island Telephone Cooperative (2,700 lines), Highland Telephone Cooperative (1,000 lines), Mountain Grove-Williamsville Telephone Company (1,200 lines), Roanoke and Botetourt Telephone Company (6,800 lines), Peoples Mutual Telephone Incorporated (6,500 lines), Pembroke Telephone Cooperative (2,300 lines), and Burke's Garden Telephone Company (110 lines). SRVT believes that rural local exchange carriers ("LECs") are uniquely qualified to deliver personal communications services ("PCS") to customers. The Commission's rules should provide this opportunity to assure timely, effective deployment of PCS in rural areas.

Small LECs should be eligible for PCS licenses. In many cases, PCS may be the most cost effective method for satisfying customer needs. LECs should be able to choose among available technologies to meet this challenge. Indeed, PCS may be the only solution for meeting certain future customer demands. In rural areas, customers will be more likely to realize the benefits of PCS if the LEC is eligible to provide the service. Like other rural areas, many customers in SRVT serving areas look only to the telephone company for communications advice and delivery of these services because each telco knows its customers and has a long track record for timely and effective delivery of new services.

LEC cellular holdings should not disqualify them from eligibility for PCS licenses. In many cases, cellular technology may not provide the solution for meeting customer demand for PCS. Restricting small LECs, particularly in rural areas, serves no apparent purpose and will simply delay deployment of PCS.

PCS service areas should be aligned with cellular MSAs and RSAs. This will allow a large number of entities to provide service. More importantly, it will ensure a faster deployment of PCS in rural areas than would be realized with other proposed larger serving areas. This is because the small rural area is the entire PCS business opportunity for the service provider. Alternatively, with larger service areas, the provider's focus would likely be on selected, densely populated sections of its service area. Rural areas may go unserved.

Multiple licenses should be awarded in RSAs and MSAs to eliminate concerns about anti-competitive practices. To ensure introduction of PCS as quickly as possible in rural areas, the Commission should give small LECs serving RSAs and MSAs the option to obtain a license and ensure that a block of frequencies is available for that purpose.

In no event should auctions be used to award licenses. Auctions will reduce significantly the number of entities having a realistic opportunity to obtain PCS licenses, thereby thwarting competition. Auctions may also result in rural licenses being tied up by large entities focused primarily on serving more densely populated areas with no immediate plans to serve rural areas. Most importantly, auctions will virtually eliminate the opportunity for small LECs to provide PCS, resulting in an almost certain delay in delivery of these services to customers.

In summary, SRVT encourages the Commission to establish PCS eligibility and licensing rules which allow small rural LECs to provide PCS to effectively meet customer demand on a timely basis.

Respectfully submitted,

SMALL RURAL VIRGINIA TELCOS


By: James S. Quarforth WCC

James S. Quarforth  
President  
Clifton Forge-Waynesboro  
Telephone Company for  
Small Rural Virginia Telcos  
401 Spring Lane, Suite 300  
P. O. Box 1990  
Waynesboro, VA 22980  
(703) 946-3520

November 9, 1992

CERTIFICATE OF SERVICE

I, Warren C. Catlett, hereby certify that a copy of comments of Small Rural Virginia Telcos was sent on this, the 9th day of November, 1992, by first class United States mail, postage prepaid, to those listed below.

A handwritten signature in cursive script, reading "Warren C. Catlett", is written over a horizontal line.

Warren C. Catlett

Downtown Copy Center  
1990 M Street, NW  
Suite 640  
Washington, DC 20554